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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JONATHAN DEAN IVAN MUNOZ,)	Case No.: 1:23-cv-00385-BAM
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended fifteen (15) days from July 31, 2023, up to and including August 15, 2023. This is the Defendant's first request for an extension.

Defendant requests this extension in order to review the record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel was recently assigned this case along with several other cases due in the next few weeks, and now has ten cases due in a nine-day period. Defendant's counsel will endeavor to complete these tasks as soon as possible. This

request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: July 17, 2023

/s/ Francesco Benavides*
(*as authorized via e-mail)
FRANCESCO BENAVIDES,
Attorney for Plaintiff

Dated: July 17, 2023

PHILLIP A. TALBERT
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MATHEW W. PILE
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By: /s/ Michelle A. Pavelek
MICHELLE A. PAVELEK
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation and good cause appearing, IT IS SO ORDERED that Defendant shall have a fifteen-day extension and shall respond to Plaintiff's Motion for Summary Judgment on or before August 15, 2023.
IT IS SO ORDERED.

Dated: July 18, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE